



201-15550

Product Safety and Regulatory Affairs

May 11, 2004

Mike Leavitt, Administrator  
U.S. Environmental Protection Agency  
P.O. Box 1473  
Merrifield, VA 22116

Re: HPV Chemical Challenge Program, Amendment of Commitment on CAS Nos. 7620771, 8002742, 8009038, 25103097, 31556453 and 76899359

Dear Mr. Leavitt:

Crompton Corporation on 22 December 1999 informed you that it was sponsoring CAS Nos. 7620771, 8002742, 8009038, 25103097, 31556453 and 76899359 under the HPV Chemical Challenge Program as follows:

| CAS Number | Chemical Name                                    | Start Year Date |
|------------|--|-----------------|
| 7620771    | Octadecanoic acid, 12-hydroxy-, monolithium salt | 2003            |
| 8002742    | Paraffin waxes and hydrocarbon waxes             | 2003            |
| 8009038    | Petrolatum                                       | 2003            |
| 25103097   | Acetic acid, mercapto-, isooctyl ester           | 2001            |
| 31556453   | Octadecanoic acid, tridecyl ester                | 2001            |
| 76899359   | Eicosenoic acid, methyl ester (Z)-               | 2003            |

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Through this letter, we are informing you that Crompton Corporation will no longer sponsor CAS Nos. 7620771, 8002742, 8009038, 25103097, 31556453 and 76899359 under the EPA HPV Challenge Program. We are amending our commitment for the following reasons:

| CAS Number | Chemical Name                                    | Reason for Amending Commitment   |
|------------|--|--|
| 7620771    | Octadecanoic acid, 12-hydroxy-, monolithium salt | A test plan has already been filed by the American Petroleum Institute reference AR-201-15019A                                 |
| 8002742    | Paraffin waxes and hydrocarbon waxes             | A test plan has already been filed by the American Petroleum Institute reference AR-201-13902A                                 |
| 8009038    | Petrolatum                                       | A test plan has already been filed by the American Petroleum Institute reference AR-201-13902A                                 |
| 25103097   | Acetic acid, mercapto-, isooctyl ester           | We no longer import or produce this material   |
| 31556453   | Octadecanoic acid, tridecyl ester                | Erroneous commitment: This number was incorrectly used. The correct number should be 31565374 which is not a 1990 HPV chemical |
| 76899359   | Eicosenoic acid, methyl ester (Z)-               | We no longer import or produce this material   |



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Mike Leavitt  
Crompton Corporation  
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Crompton's commitment for the remaining CAS Nos. listed in our 22 December 1999 letter to you remains intact.

Should you have any questions please do not hesitate to contact me directly at (203) 573-2219. My fax number is (203) 573-4531.

Sincerely yours,

Alan Taylor, Ph.D.  
Director, Product Safety and Regulatory Affairs  
Crompton Corporation

cc: Barbara Leczynski, USEPA  
Jim Keith, ACC Product Stewardship Team